

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re:

**HEALTH DIAGNOSTIC LABORATORY,
INC., et al.,**

Debtors.¹

Chapter 11

Case No.: 15-32919-KRH

Jointly Administered

NOTICE OF MOTION TO EXPEDITE AND NOTICE OF HEARING

PLEASE TAKE NOTICE that on March 16, 2017, Plaintiff, Richard Arrowsmith, in his capacity as Liquidating Trustee of the HDL Liquidated Trust (the “**Liquidating Trustee**”), appointed pursuant to the Debtors’ confirmed Modified Second Amended Plan of Liquidation (the “**Plan**”)² in these jointly administered bankruptcy cases (the “**Chapter 11 Cases**” or the “**Cases**”), by his undersigned counsel, filed with the United States Bankruptcy Court for the Eastern District of Virginia, Richmond Division (the “**Court**”) a *Motion for an Order Expediting Consideration of, and Shortening the Notice Period Applicable to, Motions for Approval of*

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: Health Diagnostic Laboratory, Inc. (0119), Central Medical Laboratory, LLC (2728), and Integrated Health Leaders, LLC (2434).

² Unless otherwise defined herein, capitalized terms shall have the meanings ascribed to them in the Plan, which is annexed to this Court’s Order Confirming Debtors’ Plan of Liquidation Under Chapter 11 of the Bankruptcy Code [Docket Item NO. 1095] (the “Confirmation Order”).

Douglas P. Lobel (VSB No. 42329)

COOLEY LLP

11951 Freedom Drive
Reston, VA 20190-5656
Telephone: (703) 456-8000
Direct: (703) 456-8019
Email: dlobel@cooley.com

Richard S. Kanowitz (admitted pro hac vice)

COOLEY LLP

1114 Avenue of the Americas
New York, New York 10036
Telephone: (212) 479-6000
Facsimile: (212) 479-6275
Email: rkanowitz@cooley.com

Cullen D. Speckhart (VSB No. 79096)

WOLCOTT RIVERS GATES

919 E. Main Street, Ste. 1040
Richmond, VA 23219
200 Bendix Road, Ste. 300
Virginia Beach, VA 23452
Telephone: (757) 497-6633
Direct: (757) 470-5566
Email: cspeckhart@wolriv.com

*Counsel to Plaintiff Richard Arrowsmith,
Liquidating Trustee of the HDL Liquidating Trust*

*Counsel to Plaintiff Richard Arrowsmith,
Liquidating Trustee of the HDL Liquidating Trust*

Settlement Agreements and Requests to Modify the Amended Order Granting Relief from the Automatic Stay and Establishing Procedures for Access to Proceeds of Certain Insurance Policies [AP No. 17-03029 (KRH) Docket Item No. 21](the “**Motion to Expedite**”).

In the Motion to Expedite, the Liquidating Trustee requests that this Court enter an order expediting consideration of, and shortening the notice period applicable to the following motions (together, the “**Motions**”) such that the Motions may be considered at the omnibus hearing scheduled for March 23, 2017 at 10:00 a.m., and any responses to the relief requested must be filed by 12:00 noon on March 22, 2017:

- a. Corrected Motion (1) to Approve Settlement Agreement Between Richard Arrowsmith, Liquidating Trustee, and Joseph P. McConnell; and (2) to Modify the Amended Order Granting Relief from the Automatic Stay and Establishing Procedures for Access to Proceeds of Certain Insurance Policies [Docket Item No. 20]; and
- b. Motion (1) to Approve Settlement Agreement Between Richard Arrowsmith, Liquidating Trustee, and Dennis M. Ryan; and (2) to Modify the Amended Order Granting Relief from the Automatic Stay and Establishing Procedures for Access to Proceeds of Certain Insurance Policies [Docket Item No. 19].

PLEASE TAKE FURTHER NOTICE that a copies of the Motion to Expedite and the Motions may be obtained at no charge at www.americanlegal.com/HDL or for a fee at <https://ecf.vaeb.uscourts.gov>.

PLEASE TAKE FURTHER NOTICE that your rights may be affected. You should read the Motion to Expedite carefully and discuss it with your attorney, if you have one in the Chapter 11 cases. (If you do not have an attorney, you may wish to consult one).

PLEASE TAKE FURTHER NOTICE on October 21, 2016, the Court entered its Order Establishing Omnibus Pretrial Protocol [Docket No. 18] (the “**Pretrial Protocol Order**”). The Pretrial Protocol Order governs certain procedural aspects applicable herein. A copy of the Pretrial Protocol Order may be obtained free of charge at www.americanlegal.com/HDL or for a fee at <https://ecf.vaeb.uscourts.gov>.

PLEASE TAKE FURTHER NOTICE if you do not want the Court to grant the relief requested in the Motion to Expedite, or if you want the Court to consider your views on the Motion to Expedite, then, by March 22, 2017 at 12:00 noon (the “**Objection Deadline**”), you or your attorney must:

- ☒ File with the Court, either electronically or at the address shown below, a written response pursuant to Rule 9013-1(H) of the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia and the applicable case management procedures. If you mail your written response to the Court for filing, you must mail it early enough so the Court will **receive** it on or before the Objection Deadline.

If a response is not properly and timely filed and served, the Court may deem any opposition waived, treat the Motion to Expedite as conceded and enter an appropriate order granting the requested relief without further notice or hearing.

Clerk of the Court
United States Bankruptcy Court
701 East Broad Street
Suite 4000
Richmond, VA 23219

You must also serve a copy of your written Objection to the Liquidating Trustee and any affected parties so that the Objection is received on or before the Objection Deadline.

- ☒ Attend a hearing before the Honorable Kevin R. Huennekens, United States Bankruptcy Judge, at 10:00 a.m. (prevailing Eastern Time) on March 23, 2017, at the United States Bankruptcy Court for the Eastern District of Virginia, Richmond Division, 701 East Broad Street, Room 5000, Richmond, Virginia 23219.

Dated: March 16, 2017

Respectfully submitted,

/s/ Cullen D. Speckhart
Cullen D. Speckhart (VSB No. 79096)
WOLCOTT RIVERS GATES
919 E. Main Street Ste. 1040
Richmond, VA 23219
200 Bendix Road, Ste. 300
Virginia Beach, VA 23452
Telephone: (757) 497-6633
Direct: (757) 470-5566
Email: cspeckhart@wolriv.com

Douglas P. Lobel (VSB No. 42329)

COOLEY LLP

11951 Freedom Drive

Reston, VA 20190-5656

Telephone: (703) 456-8000

Direct; (703) 456-8019

Email: dlobel@cooley.com

Richard S. Kanowitz (admitted pro hac vice)

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1114 Avenue of the Americas

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Email: rkanowitz@cooley.com

Counsel to Plaintiff Richard Arrowsmith,

Liquidating Trustee of the HDL Liquidating Trust